



October 6, 2022

**Via ECF**

Hon. Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *See, et. al. v. Government Employees Insurance Company, et al.*, No. 2:21-cv-547-PKC-JMW

Dear Judge Chen:

Plaintiffs respectfully submit a recent order in *Volino v. Progressive Cas. Ins. Co.*, 1:21-cv-06243-LGS (S.D.N.Y. Oct. 6, 2022), as supplemental authority in support of Plaintiffs' Response to Defendants' Objections to the Report and Recommendation of Magistrate Judge Wicks (ECF No. 87). A copy of the decision is attached hereto as Exhibit A. Plaintiffs respectfully submit that the *Volino* opinion is significant and pertinent to the arguments raised in Plaintiffs' Response at pages 7–16.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Hank Bates", with a stylized flourish at the end.

Hank Bates

cc: All Counsel of Record via ECF